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June 29, 2022

VIA ECF & EMAIL

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: *U.S. v. Aaron Starks*
 21 Cr. 499 (PAE)**

Dear Judge Engelmayer:

I represent Aaron Starks, the defendant in the above-referenced matter. On August 10, 2021, Mr. Starks was released on a \$150,000 bond, co-signed by 3 financially responsible persons with home incarceration and location monitoring. On October 21, 2021, Mr. Starks' bond conditions were modified from home incarceration to home detention. The purpose of this letter is to respectfully request a modification of Mr. Starks bond conditions. Specifically, it is requested that the condition of home detention be modified to a curfew so that Mr. Starks can participate in overtime offered by his current employer. Mr. Starks obtained employment at Citi Bike as a bike mechanic. He is currently stationed at a warehouse in Brooklyn with over 1,000 bicycles that are being cycled in and out to be repaired, especially during the summer months when bike usage is up. His hours are 7:00 a.m. to 3:00 p.m.; however, overtime is being offered from 3:00 p.m. to 11:00 p.m. Mr. Starks would like the opportunity to participate in this additional work, which would result in him returning home by approximately 12:00 a.m. on the days he is working. Additionally, it is requested that Mr. Starks' curfew be extended to 8:00 p.m. on the days he is not working. Pre-trial Services does not object to this modification and the Government defers to Pre-trial. Accordingly, it is respectfully requested that the Court modify Mr. Starks bond conditions from home detention to a curfew of midnight on the days he is working and 8:00 p.m. on the days he is off.

The Court's time and consideration of this matter are greatly appreciated.

Respectfully submitted,

/ s /

Margaret M. Shalley

cc: AUSA Kedar Bhatia
USPSO Jonathan Lettieri
(via ECF and email)

GRANTED. The defendant's curfew is modified with the hours to be set at the discretion of Pretrial Services. The Clerk of Court is requested to terminate the motion at Dkt. No. 159.